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September 1, 2020

Hon. Alvin K. Hellerstein, USDJ
US Courthouse, SDNY
500 Pearl St.
New York, NY 10007-1312

So ordered. Plaintiff's opposition to Google's motion to dismiss shall be filed by October 5, 2020, and Google's reply shall be filed by November 12, 2020.

/s/ Alvin K. Hellerstein
9/4/2020

Re: Sholem Weisner v. Google LLC, et al (SDNY 1:20-cv-02862)

Dear Judge Hellerstein:

I represent Plaintiff Weisner in the above matter. I write to respectfully request a 30 day extension through/including October 5, 2020 to file Plaintiff's Opposition to Defendant Google's Motion to Dismiss Plaintiff' First Amended Complaint with Prejudice filed on August 21, 2020 and refiled on August 24, 2020 (ECF #s 32-35) ("Google's Motion").

As per 1D of your Individual Practices: (i) The Original Date (i.e. last day) to file Plaintiff's Opposition to Google's Motion is September 4, 2020 (SDNY LR Rule 6.1(b); (ii-iii) There has been no prior Plaintiff extension request; (iv) Adversary Counsel for Defendant Google has consented to the requested 30 day extension through/including October 5, 2020, provided Plaintiff consents, and Plaintiff does consent, to a comparable extension through/including November 12, 2020 for Defendant Google's Reply to Plaintiff's Opposition to Google's Motion (v) No prior date has previously been scheduled after the Original Date.

I am a sole practitioner, and am seeking a first time adjournment to file Plaintiff's Opposition to Google's Motion due to: a) other Motion Practice herein (Plaintiff's Cross-Motion/Opposition (ECF #s 36-39) to Involuntary Party Nemanov's Motion to Realign (ECF #s 28-30), b) the press of other State and Federal litigated matters, c) the need for Plaintiff's Patent Counsel to review Google's Motion. With the exercise of reasonable diligence I have been unable to prepare Plaintiff's Opposition to Google's Motion and am therefore requesting a 30 day extension of time to do so.

Therefore, good cause appearing, I respectfully request an extension of 30 days through/including October 5, 2020 to file/serve Plaintiff's Opposition to Google's Motion.

Respectfully submitted,

/s/ Jacob Ginsburg

Jacob Ginsburg, Esq.

cc:

Counsel for Defendant Google via ECF

Counsel for Involuntary Party Nemanov via ECF